

Exhibit A

DISCOVERY PLAN WORKSHEET

Phase I (Pre-Settlement Discovery)

Deadline for completion of Rule 26(a) initial disclosures and any HIPAA-complaint records authorizations:	Rule 26(a) disclosures: 12/4/20 HIPAA: 12/28/20
--	---

Completion date for Phase I Discovery as agreed upon by the parties: <i>(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)</i>	2/9/21
--	--------

Date for initial settlement conference: <i>(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)</i>	2/24/21
--	---------

Phase II (Discovery and Motion Practice)

Motion to join new parties or amend the pleadings: <i>(Presumptively 15 days post initial settlement conference)</i>	3/9/21
--	--------

First requests for production of documents and for interrogatories due by: <i>(Presumptively 15 days post joining/amending)</i>	3/24/21
---	---------

All fact discovery completed by: <i>(Presumptively 3.5 months post first requests for documents/interrogatories)</i>	End of fact depositions: 7/3/21 End of fact discovery: 7/10/21
--	---

Exchange of expert reports completed by: <i>(Presumptively 30 days post fact discovery)</i>	Plaint. expert rpts.: 9/10/21 Def. expert rpts.: 11/30/21
---	--

Expert depositions completed by: <i>(Presumptively 30 days post expert reports)</i>	1/30/22
---	---------

COMPLETION OF ALL DISCOVERY BY: <i>(Presumptively 9 months after Initial Conference)</i>	1/30/22
--	---------

Final date to take first step in dispositive motion practice: <i>(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)</i>	3/2/22
---	--------

Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?	No
--	----